

## REMARKS/ARGUMENTS

Claims have been amended to further clarify the subject matter regarded as the invention. In addition, claim 7 has been added (see, for example, Figures 1 and 2 of the present application, and in particular, Figure 1 depicting receiving antenna cases 300a, 300b, 300c and 300b and a sending antenna case 200, and Figure 2 depicting in greater detail sending and receiving antenna cases).

The Examiner's rejection of claims under 35 U.S.C. § 112 and 35 U.S.C. § 103 is fully traversed below.

### Rejection of claims 1 and 6 under 35 U.S.C. § 112

Figure 1 of the present application depicts a number of vehicles between a sending antenna case 200 and receiving antennas cases 300a, 300b, 300c and 300b in a service area 70. In addition, the specification states: “[i]n the service area 70, there are regions in which vehicles such as passenger cars, trucks, or the like park. The access point 10 provides the wireless LAN terminal devices built into or bought to vehicles parking in this region or to terminal devices within the service area 70 such as installed terminal devices” (Specification, page 7, lines 8-12).

Accordingly, it is respectfully submitted that the present application fully, clearly, concisely and exactly supports the claimed feature of : “*a plurality of receiving antennas around the sending antenna for receiving the radio frequency signal from a terminal device located between the sending antenna and the receiving antennas*” (claim 1). Therefore, it is respectfully requested that the Examiner withdraw the rejection of claims 1 and 6 under 35 U.S.C § 112.

### Rejection of claims 1 and 3-6 under 35 U.S.C. § 103

It is noted that *Diener et al.* pertains to “[a] system and method for determining the location of a source (target device) of a wireless radio signal of an unknown or arbitrary type for which a signal correlator is not known or available” (*Diener et al.*, Abstract). It is further noted that figure 11 of *Diener et al.* depicts “a block diagram showing one of two possible positions of the TT [Target Terminal] with respect to a reference terminal (RT)” (*Diener et*

al., brief description of the drawings). In other words, Figure 11 depicts a number of target terminals (TTs) 100 and a number of reference terminals (RTs).

Claim 1 recite: *a receiving synthesis unit that is connected to each one of a plurality of receiving antennas by wired cable and performs diversity receiving with respect to received radio frequency signals from a plurality of receiving antennas around a sending antenna for receiving radio frequency signal from a terminal device located between a sending antenna and the receiving antennas.*

In the Office Action, the Examiner has asserted that *Wallstedt* teaches: a receiving synthesis unit that is connected to a receiving antenna by wired cable and performs diversity receiving with respect to received radio frequency signals (Office Action, page 4, citing Col. 6, lines 50-60 of *Wallstedt*). It is noted that *Wallstedt* states that a “[b]lock 29 performs diversity combining of the signals received on the appropriate channel from the appropriate RAD” (Col. 6, lines 59-61).

However, it is apparent that this teaching does not address the claimed feature of: performing diversity receiving with respect to received radio frequency signals from a plurality of receiving antennas around a sending antenna for receiving radio frequency signal from a terminal device located between the sending antenna and the receiving antennas.

In order to overcome this deficiency, the Examiner has merely asserted that *Diener et al.* discloses “a terminal device located between the sending antenna and receiving antennas” (Office Action, page 4, citing Figure 11 of *Diener et al.*). Initially, it is respectfully submitted that this assertion in itself is not enough to establish a *prima facie* case of obviousness because the Examiner needs to at least provide factual evidence to support the assertion that *Diener et al.* teaches: performing diversity receiving in a specific claimed configuration, namely, a plurality of receiving antennas around a sending antenna for receiving radio frequency signal from a terminal device located between the sending antenna and the receiving antennas. Accordingly, it is respectfully submitted that the Examiner’s rejection under 35 U.S.C. § 103 is improper and should be withdrawn.

Furthermore, contrary to the Examiner’s assertion, it is earnestly believed that Figure 11 of *Diener et al.* does not even teach the specific claimed configuration as each one of the reference terminals (RTs) and target terminals (TTs) have a sending and receiving antenna and, as such, can be considered to be an independent terminal.

Moreover, it is earnestly believed that *Diener et al.* and *Wallstedt* taken alone, or in any proper combination, do not teach or suggest the claimed feature of: *a receiving synthesis unit that is connected to each one of a plurality of receiving antennas by wired cable and performs diversity receiving with respect to received radio frequency signals from a plurality of receiving antennas around a sending antenna for receiving radio frequency signal from a terminal device located between a sending antenna and the receiving antennas* (claims 1 and 6).

Therefore, it is earnestly believed that claims 1 and 6 are patentable over *Diener et al.* and *Wallstedt* taken alone, or in any proper combination.

It should be noted that new claim 7 recites:

*a plurality of receiving antenna cases around a sending antenna case, wherein each of the plurality of receiving antenna cases includes a receiving antenna unit and a receiving conversion unit, wherein the receiving antenna unit operable to receive a radio frequency signal from the terminal device, and wherein the receiving conversion unit operable to convert the radio frequency signal received by the receiving antenna unit into a digital signal for transmitting to the information processing unit;*

*a plurality of wired cables operable to transmit: (a) the digital signal from the main unit case to the sending antenna case, and (b) the digital signal from the receiving antenna case to the main unit case; and*

*wherein a information processing unit includes a receiving synthesis unit that performs diversity receiving with respect to the radio frequency signal received at the plurality of receiving antenna cases* (see, for example, Figures 1 and 2 of the present application, and in particular, Figure 1 depicting receiving antenna cases 300a, 300b, 300c and 300b and a sending antenna case 200, and Figure 2 depicting in greater detail sending and receiving antenna cases).

In other words, claim 7 recites a configuration of multiple receiving antenna units respectively in *a plurality of receiving antenna cases* effectively provided around a sending antenna for diversity receiving. It is respectfully submitted that the *cited art* does not teach or suggest this claimed configuration and claim 7 is therefore patentable over the *cited art* for at least this reason.

In fact, in stark contrast to the claimed invention, *Wallstedt* teaches using multiple RADs capable of both sending and receiving for diversity receiving. As such, it is respectfully submitted that *Wallstedt* teaches away from the specific claimed configuration recited in claim 7 and consequently *Wallstedt* cannot be combined with another reference to teach the invention recited in the claim 7.

## CONCLUSION

Based on the foregoing, it is submitted that the claims are patentably distinct over the cited art of record. Additional limitations recited in the independent claims or the dependent claims are not further discussed because the limitations discussed above are sufficient to distinguish the claimed invention from the cited art. Accordingly, Applicant believes that all pending claims are allowable and respectfully requests a Notice of Allowance for this application from the Examiner.

Applicant believes that all pending claims are allowable and respectfully requests a Notice of Allowance for this application from the Examiner. Should any fee be required for any reason related to this document, the Commissioner is hereby authorized to charge said fee to Deposit Account No. 504481, referencing Docket No. MES1P093. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

Respectfully submitted,  
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